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December 20, 2018

VIA ECF

Hon. Vernon S. Broderick
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Anthony Boncimino v. NYS Unified Court System, et al.
Case No.: 17-cv-06760 (VSB)

Dear Judge Broderick:

This firm represents Plaintiff Anthony Boncimino ("Plaintiff" or "Officer Boncimino") in the above-referenced matter and we write on behalf of all Parties. We write to request a 90-day extension of all deadlines in the Case Management Plan and Scheduling Order so ordered on October 4, 2018 (the "Scheduling Order").

On October 4, 2018, your Honor directed the Parties to complete depositions by January 18, 2019. To date, the Parties have made significant progress in conducting paper discovery, having exchanged responses to interrogatories and document requests in early November 2018. The Parties have also produced numerous pages of responsive documents. Additionally, Plaintiff executed 29 Authorizations for Release of Health Information Pursuant to HIPAA. Plaintiff's efforts to provide authorizations to Defendants that could then be sent to medical providers were met with some difficulty. Those issues, however, appear to have been resolved. Given the delay, however, efforts to obtain Plaintiff's substantial medical documentation are ongoing. Given the voluminous discovery production and the fact that all medical documentation for Plaintiff has not yet been received, the Parties have not been able to commence depositions. We are working to schedule depositions as soon as possible, but anticipate that we will not be able to complete depositions by January 18th.

Accordingly, the Parties respectfully request a 90-day extension of all deadlines in the Scheduling Order. We thank the court for its consideration of this request.

Respectfully submitted,

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Liane Fisher (LF-5708)